

SOUTH AUSTRALIA'S EXPERT PANEL
OUR IDEAS FOR REFORM ON PLANNING REFORM

A submission by the
Shopping Centre Council of Australia

September 2014

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EXECUTIVE SUMMARY

The Shopping Centre Council of Australia (SCCA) welcomes the opportunity to comment on the *South Australia's Expert Panel Our Ideas for Reform on Planning Reform* discussion paper. We respectfully request that our [comments and 14 recommendations](#) are taken into consideration by the Expert Panel in preparing its final report which is scheduled to be released in December 2014.

Our members are Australia's major owners, managers and developers of retail property (see full list at section 4 of this submission). Our members have significant investment interests in South Australia.

We congratulate the Expert Panel on preparing a comprehensive reform framework, including 27 separate (but interlinked) 'reform ideas' for community consultation. We note and agree with the Panel's comment that such changes "may require several years of sustained work"; with the need for early action and a staged approach to implementation with prioritised reforms.

SUPPORT + PRIORITIES

We broadly support the reforms proposed by the Expert Panel.

In particular, we support the proposed State Planning Commission, Regional Planning Board and the State Planning Directions/State Planning Code. We believe these reforms should be prioritised. Retail policy should be a key focus of the new State Planning Code, particularly to provide a clear and consistent zoning and development assessment framework and overcome barriers.

We endorse the Panel's view that "planning has a pivotal role in South Australia's future"...and..."planning decisions can and must boost productivity, competitiveness, resilience, sustainability, well-being and community development".

In this regard, the planning system clearly has a multi-faceted role. It must, for instance, help deliver strategic and geographic plans such as the *30-Year Plan for Greater Adelaide*. To cite one example, if a shopping centre sits in an identified growth area (e.g. a major centre), the planning system should give preference to, and ensure there are minimal barriers to enable such growth to occur an efficient manner; whether it's reflected in a Development Plan or a streamlined development assessment process. This is particularly the case where such development often meets multiple objectives such as increased infrastructure efficiency (and therefore improved productivity), mixed-uses and community outcomes.

CONCERNS + FURTHER CONSIDERATION NEEDED

Our concerns, summarised below, stem from reform proposals that have the potential to undermine the strategic objectives of broader reform program which we have noted above. Further, given SA's current position of being a high taxing state, where there is no shortage of revenue collected through property taxes, the proposed new infrastructure levies could negatively impact development feasibility and investment.

<u>REFORM NO.</u>	9 & 11 (Zoning)	23 (Infrastructure funding)
<u>ISSUES/WHY?</u>	Undermine strategic planning Undermine centres hierarchy Create imbalance in retail formats Some retail favoured over others	Existing property tax base not considered Negative impact on development feasibility Loss of SA competitive advantage No nexus/apportionment test guaranteed

While we have concerns with some proposals (e.g. community charter, appeal mechanisms), this submission focuses on the specific reforms noted above which we strongly believe need further consideration:

1. The proposed form-based zoning (Reform No. 9) is a cause for concern, particularly the associated commentary (which lacks any justification or analysis) such as the “re-think” of the centres hierarchy. Particularly given the Government’s strong focus on strategic planning, and the need to boost productivity, competitiveness and sustainability, this is a strange and concerning statement.

Such a move would be in stark contrast to every other jurisdiction and sensible economic, competition and transport/infrastructure policy, and could undermine other aspects of the reform program. It could also result in ‘picking winners’ with retail formats given the sole reference to small supermarkets and no other retail format, such as shopping centres. Was any other retail format, apart from ‘small supermarkets’, considered in preparing the proposed reforms?

As an one example of evidence that may not have been considered on this issue, we note that shopping centres have higher retail employment ratios than other forms of retailing such as bulky goods outlets. Surely evidence such as employment density and ratios should be considered as a critical input when making planning reform recommendations and priorities. The following table prepared by Urbis illustrates the differences between retail asset classes:

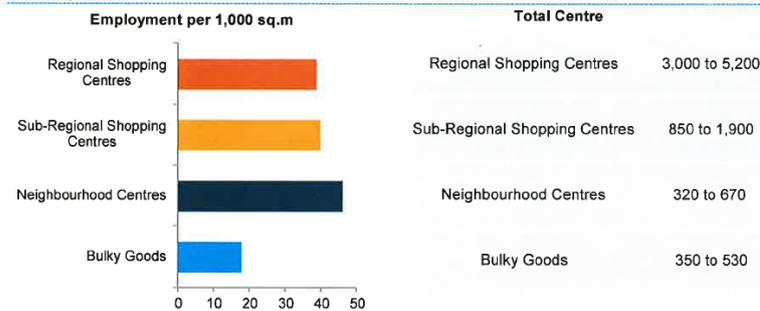
Table 1: Urbis Indicative Retail Employment Yields

EMPLOYMENT YIELDS

Shopping centres generate higher levels of employment relative to other less productive forms of retailing. As shown in Table 2.2, shopping centres generate 39 to 46 employees per 1,000 sq.m of floorspace, substantially higher than 18 employees per 1,000 sq.m of floorspace generated by bulky goods.

Indicative Employment Yield by Asset Class

RETAIL, EMPLOYMENT TABLE 2.2



Source: Urbis

We have similar concerns with Reform No. 11 (make changing plans easy, quick and transparent), whereby zonings could be de-linked from strategic planning. It could result in an imbalance by favouring certain formats over others, where some (e.g. shopping centres) are forced to support the growth of key centres in accordance with metropolitan planning; whereas other are not subject to similarly rigorous assessment and development requirements.

These reform proposals, along with any proposed “re-think” of the centres hierarchy, need to be carefully considered as part of the reform program and required detailed industry consultation.

2. The proposed new tools for infrastructure funding and delivery (Reform No. 23) are also a cause for concern. The lack of development levies, particularly akin to those in other jurisdictions (e.g. section 94 levies in NSW), has been a competitive advantage of the South Australian planning system.

We have been, and continue to be, involved in infrastructure levies reviews in NSW, Queensland and Victoria given the unique characteristics of shopping centre development. While some improvements have been introduced, we would caution the South Australian Government against going down a similar path than (for instance) the NSW system.

It is our experience that levies can act as a serious hand-brake on retail development. We can cite examples whereby proposed levies and associated infrastructure conditions on an individual shopping centre project can reflect up to 50% of the construction cost. This is madness.

Further, the proposed value-capture / improvement levy is a major concern. South Australia is already a high taxing state for retail property (the highest for small shopping centres – the 2nd highest for large shopping centres). The Government already taxes improvements through council rates and the Emergency Services Levy (ESL) which are both based on capital value (CV). The Government should be investigating funding options through the existing property revenue base before imposing any further taxes.

It is our strong recommendation that the Government establishes a working group to develop the proposed infrastructure funding models (similar to those in Victoria, Qld and NSW).

We would welcome the opportunity to discuss this submission to help achieve the objectives of planning reforms. Our contact details appear at the end of this submission.

1. RETAIL: A CRITICAL REFORM ISSUE

The retail sector is a critical component of the South Australian economy, and the planning system should provide a clear, certain and consistent framework for investors.

Retail is a major employer in South Australia, in both full-time and part-time jobs.

Retail planning issues are already a fundamental component of the planning system.

By way of example, the *30-Year Plan for Greater Adelaide* notes the importance of retail development particularly in relation to activity centres. Retail jobs (an additional 44,000) is also noted as a key outcome area of the Plan.

At the more detailed level, 'shop' is a defined term in the *Development Regulations* and other retail uses, such as 'bulky goods outlets' have specific definitions to note the differentiation in the sale of goods.

Applying the general rule of 2m²/capita, South Australia will need significant retail floorspace in the based on general population projections outlined by the ABS.

As a related example, the proposed additional 560,000 people over 30 years in the Adelaide Plan amounts to around 1.1 million square metres of retail floor space.

South Australia is reasonably well served by shopping centre space when compared with other jurisdictions on a per capita basis. From 1994-2004 SA added 16 shopping centres and 530,000m² of shopping centre floor space.

RECOMMENDATIONS

- 1. Retail should be a critical consideration in the planning reform process.**
- 2. Well-located retail development, which contributes to multiple growth objectives (e.g. mixed-uses, transport efficiency), should be a key feature of the new planning system.**

2. SUPPORTED REFORMS

We broadly support the Panel's proposed reform package.

When considered in full, the proposed reforms, which span across a range of areas (e.g. roles, plan-making, development pathways), have the potential to provide a strong planning system platform to articulate and enable the achievement of the Government's growth and development objectives.

GOALS AND GUIDING PRINCIPLES

We strongly support reform *Goals* and *Guiding Principles*.

If applied correctly and consistently, these goals and guiding principles will ensure that the reforms are comprehensive and well-considered. Importantly, these highlight the importance of well-shaped cities, community aspirations, economic growth and sustainability.

The *Goals* (as noted at page 19) include:

Figure 3: Goals for the new planning system

- shape cities, towns, neighbourhoods and country regions according to the needs and aspirations of communities, present and future
- underpin the state's economic growth, competitiveness and productivity in ways that are just, sustainable and reflect community aspirations
- maximise the economic potential, social utility and amenity of land and natural resources for the state as a whole, as well as for specific communities
- minimise and mitigate avoidable adverse impacts on, and contribute to enhancements to, natural environments, ecosystems and biodiversity

The *Guideline Principles* include:

1. *Partnerships and Participation*

An easily understood planning system that establishes constructive engagement between users and decision-makers.

2. *Integration and coordination*

A planning system that enables an integrated approach to both high-level priorities and local policy and decision delivery.

3. *Design and Place*

A planning system that supports the creation of places, townships and neighbourhoods that fit the needs of the people who live and work in them now and in the future.

4. *Renewal and Resilience*

A planning system able to respond and adapt to current and future challenges through innovation and the implementation of sustainable practices.

5. *Performance and Professionalism*

A planning system that is consistent, transparent, navigable, efficient and adaptable, that supports clear decision-making and encourages and facilitates investment.

SUPPORTED REFORMS: A SNAPSHOT

In the context of the *Goals* and *Guiding Principles* noted above, we support a number of the reforms across the Panel's following areas:

- Roles, Responsibilities and Participation (Recommendations 1-5)
- Plans and Plan-Making (Recommendations 6-11)
- Development Pathways and Processes (Recommendations 12-19)
- Place-Making, Urban Renewal and Infrastructure (Recommendations 20-23)
- Alignment and Delivery (Recommendations 24-27)

In particular we welcome the following reform proposals:

Planning Commission (Reform No. 1)

Reform 1 proposes the establishment of the State Planning Commission.

We support this proposal, including its broad oversight role including the proposed state planning policies (see below), declaring urban renewal precincts and issuing guidelines and practice notes.

Regional Planning Boards (Reform No. 2)

Reform 2 proposes the establishment of Regional Planning Boards.

This is a sensible reform proposal, particularly to ensure that state government policy directions are properly incorporated at the local level. This will be critically important given the proposed State Planning Directions and State Planning Code (see below). The functions of the Boards will also include the preparing of regional strategies as well as the approval of council rezoning proposals.

State Planning Directions / State Planning Code (Reforms No. 6 and 8)

Reform 6 proposes a process for making new policy instruments called 'statewide planning directions', and Reform 8 proposes a state-wide suite of planning rules to be known as the 'state planning code'.

The state planning code is proposed to include a comprehensive menu of zones, overlays and merit-based and complying provisions and standards; with scope for local variations. This development of the Code is proposed to be undertaken by the proposed State Planning Commission.

We strongly believe this state-wide approach should have a focus on retail planning and investment issues, particularly to ensure there is a clear and consistent set of rules (while still enabling local variations). This could be a great opportunity to streamline the approach for retail development.

RECOMMENDATIONS

- 3. The establishment of the State Planning Commission and Regional Planning Boards should be a priority in the reform process.**
- 4. The State Planning Directions and State Planning Code should also be a priority in the reform process, and include the development of a clear and consistent set of rules for retail development and investment; consistent with broader strategic planning objectives.**

3. REFORMS: FURTHER CONSIDERATION NEEDED

As noted in a previous section, we have concerns with two reform areas which we want to bring to the attention of the Expert Panel. The first includes zoning (Reforms 9 and 11). The second includes the new tools for infrastructure funding and delivery (Reform No. 23).

Our concerns relate to the potential for these reforms to undermine the strategic objectives of broader reform program.

We have sought to frame our feedback based on the 'key questions for feedback' as outlined at Figure 2 (page 13) as follows:

- Which ideas are most workable and suitable?
- How can specific ideas be improved or modified?
- What costs, benefits or other implications should the panel consider?
- What other reform ideas should be considered?

3.1 FORM-BASED ZONING – A “RETHINK” OF CENTRES HEIRARCHY?

Reform 9 proposes a form-based zoning approach to be implemented through the proposed State Planning Code.

We note that this reform proposal is based on urban design principles (e.g. streetscape, landscape, landscape character), including the articulation of neighbourhood character, through instruments such as structure plans and master plans. We do not disagree that “design should be fundamental to planning in urban areas: it offers ways to link private and public spaces; it helps maintain and enhance established character; and it helps visualise character, giving it a valuable role in promoting community engagement in planning processes”.

We also support the proposed urban design basis given it is based on linking zoning and design; principally through a design approach, thus being that “effective design can remove the need for land use to be the principal basis for the assessment process; especially in urban renewal areas where a mixed approach is desirable. In such areas especially, design must lead planning practice”. This would bring a great advantage to better enabling new development to occur.

Our members have experience in using structure and master planning processes for their developments, including the incorporation of infrastructure and mixed-uses.

However, the commentary on this proposal suggests that to “create the flexibility inherent in mixed-use zoning necessary to stimulate and foster investment and manage urban change”, a form-based approach could enable (for instance) small-format supermarkets to open outside designated activity centres.

The paper then notes (at page 65):

We recognise that South Australia has already experimented with form-based and mixed-use zoning approaches and that there are no restrictions in the current system to applying these approach. However, there may be ways that the legislation can be adjusted to better accommodate such an approach. For example, form-based approaches could be advanced by a review of land use definitions, a rethink of the centres hierarchy and design consents. We invite further comments on this point, understanding that changes to the expression of zones and planning rule swill require sustained effort over a number of years.

We strongly believe that the proposed “review” and “re-think” needs careful consideration, and should be undertaken in consultation with industry. This includes the costs and benefits of undermining the centres hierarchy, as well as retail investment within the centres hierarchy.

The Panel needs to consider (or recommend the consideration of) a range of issues in such a “re-think”, particularly given the centres hierarchy is a key element of South Australia’s strategic planning.

As an example of the issues that would need to be considered in such as “re-think”, the consultants *SGS Economics and Planning* have advised us on the benefits of an activity centres/centres hierarchy approach to land-use planning. These benefits should not be overlooked or discarded by the Expert Panel, or the Government, in the advancement of a form-based zoning approach, or as a form of micro-economic policy that seeks to pick winners whether they are so-called new retail entrants or formats (such as the ‘small format supermarkets’ mentioned in the paper).

The benefits outlined of activity centres and the centres hierarchy outlined by *SGS Economics and Planning* includes the following (which we have then linked with the associated goals, guiding principles and objectives of the planning reforms):

- **Sustainable travel**
 - Reduced passenger vehicle kilometres travelled (VKT) per year per capita
(N.B. The proposed ‘sustainability’ goal of the planning reforms)
 - Greater physical activity
(N.B. The proposed ‘community well-being’ goal of the planning reforms)
- **Labour productivity enhancements**
 - Agglomeration economies
(N.B. The proposed ‘productivity’ and ‘competitiveness’ goals of the planning reforms)
 - Increased human capital
(N.B. The proposed ‘productivity’ goal of the planning reforms)
- **Development density**
 - Housing diversity
(N.B. The proposed ‘community well-being’ goal of the planning reforms)
 - Efficient utilisation of infrastructure and resources
(N.B. The proposed ‘productivity’ and ‘economic growth’ goals of the planning reforms).
 - Avoided consumption of rural and agricultural land.
(N.B. The proposed ‘maximise the potential of natural resources’ goal of the planning reforms).

In addition, it is worth noting that activity centres also vary in size and diversity within a hierarchy ranging from higher-order activity centres to lower order activity centres, serving regional to local geographic spheres of affiliation or ‘catchments’. This model has served South Australia well to date, and can continue to do so.

Achieving an activity centres-based urban form requires activity centres which, ideally:

- Contain **mixed use** development including retail, commercial at different scales, residential and other uses;
- Contain **higher density** development, especially in the centre’s core; and
- Are well serviced by **transport** infrastructure, particularly public transport infrastructure.

We would gladly provide further information on the analysis undertaken by *SGS Economics and Planning* on the above issues.

CENTRE BENEFITS: THE ADELAIDE PLAN

With regard to benefits of activity centres noted above, it is also worth noting that a lot of these benefits are already articulated in South Australian Government policies such as the *30-Year Plan for Greater Adelaide*. In the Plan (section D6 – Mixed-use activity centres), the Government clearly articulates that “activity centres provide concentrations of business, administrative, civic, retail, entertainment, employment, research, education and community uses, and – increasingly – residential development. The purpose of activity centres is to cluster commercial and employment activity to improve accessibility, productivity and the efficient use of infrastructure”.

This highlights that the centres hierarchy is a fundamental component of South Australia’s strategic planning; as it is with all other jurisdictions.

It also highlights that the Expert Panel needs to give further consideration to the costs, benefits and implications of the proposed reforms.

WHERE DOES REFORM 11 FIT IN?

In addition to the concerns associated with Reform No. 9, we are also concerned as to where Reform No. 11 fits in given it possibly opens up spot rezoning opportunities that do not have to be consistent with strategic plans.

While we understand and appreciate that the intent of this proposed reform is to “make changing plans easy, quick and transparent”, and to ensure Development Plans are consistent with strategic plans, there doesn’t seem to be any corresponding assessment requirements. If Reform No. 11 is to progress, such a move must not be de-linked from strategic planning requirements and, similar to our comments above, result in the undermining of the centres hierarchy.

RECOMMENDATIONS

- 5. The proposed form-based zoning needs to be carefully considered.**
- 6. The Expert Panel should provide further clarification on what the potential “rethink” on the centres hierarchy means; particularly given a lot of companies have based current and proposed major investments based on this approach.**
- 7. The Expert Panel should consider and respond to broad benefits of the activity centres approach to land-use planning and retail investment outlined in this submission, when making recommendations on the proposed “rethink” of the centres hierarchy.**
- 8. The form-based approach to zoning should not result in an uneven playing field, whereby some retail formats have more difficult and onerous development requirements than other formats (e.g. development within an activity centre versus out of centre).**
- 9. The Expert Panel should note the superior employment ratios of shopping centres when considering issues that impact retail planning and investment.**
- 10. The approach to spot-rezoning needs to be carefully considered to ensure that it doesn’t undermine strategic planning.**

3.2 NEW TOOLS FOR INFRASTRUCTURE FUNDING

Reform 23 proposes to “create new tools for infrastructure funding and delivery”.

This includes (at 23.3) proposed tools such as “infrastructure levies, bond products, or metropolitan-wide improvement levies”; which will be directly linked to the infrastructure required.

This also includes standardised criteria for statutory augmentation charges, as well as new design standards to avoid “gold-plating”.

We urge caution on the investigation of these new tools, particularly based on our extensive experience in other jurisdictions such as NSW, Queensland and Victoria.

INFRASTRUCTURE LEVIES

We have significant experience with infrastructure levy policy, and the impact of infrastructure levies, in other jurisdictions and the Expert Panel should acknowledge that such levies can serve as a hand-brake to retail development.

We are concerned that the proposed infrastructure levies, even in concert with the proposed bond products or metropolitan-wide improvement levies, will result in massive increases in the cost of development.

We can cite examples proposed levies and associated infrastructure conditions on an individual project can reflect up to 50% of the construction cost. Such an onerous impost would obviously make a project unfeasible.

To date, South Australia has a competitive advantage over other jurisdictions in having minimal infrastructure levies, particularly given the current system is mostly confined to infrastructure augmentation.

The impact of infrastructure levies on retail development has led to a number of reviews in other jurisdictions in recent years. We have been involved in all of these reviews, including being a member of the relevant government working groups.

This includes the Queensland Government review which was completed in recent months with the passage of the *Sustainable Planning (Infrastructure Charges) and Other Legislation Amendment Bill 2014*.

The Victorian Government has recently completed a review of their development contributions system, with the *Planning and Environment Amendment (Infrastructure Contributions and Other Matters) Bill 2014* recently passing Parliament, following an announcement on the new regime in May this year. We are a member of the Government’s current advisory group.

The NSW Government has also proposed a new framework, which included the establishment of an Infrastructure Contributions Taskforce (which we are a member of), however this is currently idle due to a stalemate in their broader reform program given the Bill did not pass Parliament.

Infrastructure levy principles

While we note that the proposed new levies will be directly linked to the infrastructure required (i.e. there is a nexus between the development and infrastructure), and that standardised criteria for augmentation charges are proposed, we believe that a comprehensive set of principles need to be adopted. The levies framework should concentrate on the following outcome areas:

1. Feasible and certain. Levies should be feasible. We are concerned that the proposed infrastructure levies, and possibly associated agency conditions, will make a development unfeasible. Levies also have to be clear and certain.
2. Nexus and scope. Contributions should be linked to the demand generated by development. In this regard, we believe that retail development should not be required to contribute to open space and community infrastructure.

We also want to ensure that a levy is structured on a demand-generation unit such as a charge per incremental floorspace, as opposed to a levy based as a percentage of construction cost or development value. This latter approach merely penalises higher cost projects which, for instance, are required by government policies to have higher quality design and materials (N.B. our comments on the 'form-based zoning' proposal above).

3. Equity across all users. The burden should be spread to ensure there are no free-riders. There needs to be a consistent approach across comparable areas. As has occurred in other jurisdictions, there are issues where our members have contributed to infrastructure, only to have the capacity soaked up by future users that made no levy contributions (thus providing them with a competitive advantage).
4. Transparent, contestable and accountable. Demand and cost assumptions should be clear and contestable, and the critical issue of double-dipping should be avoided. Local councils and the state government should be required to actually deliver required infrastructure.

VALUE-CAPTURE / IMPROVEMENT LEVIES

We also have a major issue with value-capture and improvement funding mechanisms.

First and foremost, the Government and local councils already tax value improvements through council rates, the ESL (which has just been significantly increased) and water charges.

An infrastructure levy based on a valuation 'improvement' would merely be a fourth SA tax on capital value.

We have five broad comments on this proposal.

1. Other taxation options

We are concerned that this funding mechanism has been proposed in the absence of considering other taxation approaches and options, including investigating broadening existing tax bases such as land tax. The Government should commit to investigating other tax approaches, such as broadening land tax, as a funding mechanism. If not, the Government should provide an explanation as to why other approaches are not being considered.

2. Existing revenue from 'value uplift' and shopping centres

As noted above, the Government already benefits from private investment through the taxation system and there is already a 'sharing' so to speak, in value uplift where it occurs. The Government (and local councils) already have various income streams from land and property value, including through the capital valuation basis of valuation issued by the Valuer-General.

3. Industry consultation / value uplift assumptions

It is critical that the any investigations provide a guarantee of industry consultation and an open and transparent approach.

Given value capture is theoretical, we are also cautious about the assumptions that could be applied by the government. This includes areas where government believes that additional value can be, or is, created through its own infrastructure investment. This includes a related assumption that such value can be created without any market or even regulatory risk.

As an example, there could be an assumption that a piece of transport infrastructure could increase foot traffic within a shopping centre and therefore translate to additional value to the centre through sales and rent. However the ultimate test of such an assumption is whether foot traffic actually increases, whether that traffic translates into increased sales (and rent), and the extent to which the increase came from the infrastructure. The question then has to be asked if the Government would provide compensation if the foot traffic increase is not realised.

RECOMMENDATIONS

- 11. The Government should first investigate funding infrastructure from the existing tax base given that SA is already a high-taxing state and there no shortage of existing revenue from property taxes.**
- 12. The Expert Panel must rule out the dual introduction of infrastructure levies and metropolitan-wide improvement levies**
- 13. The levies framework needs to be based on a complete set of clear and guiding principles including (but not limited to):**
 - a. Development feasibility and certainty**
 - b. Nexus and scope.**
 - c. Equity across all users.**
 - d. Transparent, contestable and accountable.**
- 14. The Expert Panel should recommend the Government should establish a working group, including industry stakeholders, to investigate new infrastructure funding mechanisms.**

4. Shopping Centre Council of Australia

The Shopping Centre Council of Australia (SCCA) is a national advocacy group which represents the major owners, managers and developers of shopping centres. Our members own and manage more than 11 million square metres of retail space around Australia, in more than 500 shopping centres. The SCCA Chairman is Steven Sewell, CEO and Managing Director, Federation Centres. The SCCA Deputy Chairman is Michael Gorman, Deputy CEO and Chief Investment Officer, Colonial First State Retail Property Trust.

Our members are AMP Capital Investors, Blackstone Group, Brookfield Office Properties, Charter Hall Retail REIT, Colonial First State Retail Property Trust, DEXUS Property Group, Eureka Funds Management, Federation Centres, GPT Group, ISPT, Ipoh Management Services, Jen Retail Properties, Jones Lang LaSalle, Lancini Group, Lend Lease Retail, McConaghy Group, McConaghy Properties, Mirvac, Perron Group, Precision Group, QIC, Savills, Scentre Group (formerly Westfield Group and Westfield Retail Trust) and Stockland.

Contacts

The Shopping Centre Council would be happy to discuss any aspect of this submission. Please do not hesitate to contact:

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